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The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

Department of Environmental Quality Engineering

Division of Solid and Hazardous Waste

One Winter Street, Boston, Mass. 02108

S. Russell Sylva
Commissioner

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Household Hazardous Waste Collection: Policy No. 16

MEMORANDUM

TO: All Interested Parties

FROM: William F. Cass, Director

DATE: October 21, 1985

SUBJECT: Policy Memo on Household Hazardous Waste Collection Days

I. Introduction

Every day Massachusetts citizens generate small quantities of household hazardous waste, yet have few alternatives for its disposal. Although household quantities of hazardous waste are exempt from Massachusetts Hazardous Waste Regulations (310 CMR 30.104), proper disposal is required. Collectively, common household items, such as cleaners, polishes, paints, used motor oils, weed killers, chemistry sets, etc., can be a hazard to public health and safety when disposed of improperly. If such items are discarded in nearby landfills, they may explode, give off fumes, endanger the safety of the landfill operator, and may leach into groundwater, possibly contaminating water supplies. These substances when poured down the drain may corrode plumbing, collect and release fumes, cause septic-system malfunctions, and may leak out of septic systems, possibly contaminating soil and groundwater. When they reach wastewater treatment facilities, the chemicals may upset the treatment system, contaminating surface water or sludge.

In an effort to provide an acceptable disposal option for household quantities of hazardous waste, the community of Lexington sponsored a Household Hazardous Waste Collection Day in the fall of 1982. Since then many communities have held similar events and a number of them intend to repeat the Collection Day annually. These communities hired a DEQE-licensed hazardous waste transporter and gave citizens the opportunity to dispose of household hazardous wastes. Such events have acquainted residents with the hazards associated with many household products. It also reduces the quantity of this type of waste discarded in municipal landfills and poured down the drain.

II. Policy

The DEQE Division of Hazardous Waste strongly supports communities holding Household Hazardous Waste Collection Days as a practical solution to the disposal of these wastes and an effective means of increasing public awareness of the problem.

A community or civic group sponsoring a Household Waste Collection Day must hire a hazardous waste transporter licensed by the Department to bring the waste to a facility (also approved by DEQE) which treats, stores, and/or disposes of hazardous waste. The transporter also can fulfill the regulatory responsibilities of parties producing hazardous waste as defined in 310 CMR 30.010. The transporter should:

a. provide a chemist to work on site separating the chemicals into compatible groups;

b. complete the state forms to record collection and shipping information; and

c. provide containers to properly store and transport the wastes.

These procedures are set forth in 310 CMR 30.300.

Any quantity or type of hazardous waste which is produced by a household as part of normal household activity, as specified in 310 CMR 30.104, may be brought to the site of a household hazardous waste collection day for disposal. Industries and businesses producing more than 20 kilograms (approximately 5 gallons) of hazardous waste each month must comply with the Hazardous Waste Regulations (310 CMR 30.000) and shall not dispose of their hazardous waste through a collection day. Transporters hired for household hazardous waste collection days should only accept hazardous waste which is produced by households.

Licensed Massachusetts hazardous waste transporters are required by 310 CMR 30.410 to carry a minimum of $1 million liability insurance for accidents which occur during transportation activities. The Department recommends that the sponsor of the collection day become familiar with the protection the municipality's insurance may offer during the collection day, in addition to the insurance the transporter may have.

Communities also should be aware that collectors will not accept explosives such as ammunition or fireworks. These are strictly controlled by the State Fire Marshal.

III. Implementation

DEQE recommends that the municipality and a firm licensed by DEQE enter into a contract which includes the following terms:

- The DEQE-licensed transporter shall be deemed the generator;
- The DEQE-licensed transporter shall be liable in the event of a spill or accident; and
- The DEQE-licensed transporter shall provide a certificate of insurance which carries an approved DOT endorsement covering liability for accidents including environmental restoration, bodily injury, and property damage (see 310 CMR 30.410).

The Department recommends that any firm hired to conduct a Household Hazardous Waste Collection Day be licensed both for:

- transporting all types of hazardous waste; and
- serving small quantity generators (310 CMR 30.412(2)).

Enclosed is a list of contractors currently licensed for both these activities. Attached in Appendix B is a sample DEQE license for your information.

IV. For More Information

Additional guidance on funding and publicity is attached in Appendix A. For more information, please contact the DEQE Division of Solid and Hazardous Waste, One Winter Street, Boston, MA 02108, (617) 292-5851.

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APPENDIX A

INFORMATION ABOUT FUNDING AND PUBLICITY

I. Funding

Total cost for a collection day varies depending on how much waste is collected. The more sucessful the Collection Day, the more it costs. In addition to the costs involved in planning and publicizing the event, funds are necessary for:

- a policeman hired to be on duty;
- a flat fee for the hazardous waste transporter, including a truck and personnel, (i.e a chemist);
- a per-drum charge, set by the transporter, which varies depending upon the waste. For example, paints are relatively cheap to dispose of while pesticides are more expensive.

Communities have used a variety of methods for securing funds including:

- appropriations from municipal budgets;
- fund raising drives among local businesses perhaps conducted by the Chamber of Commerce;
- fund raising events held by schools, civic groups, etc; and
- users fees.

A collection day held by a group of municipalities would lower costs for each.

The Massachusetts State Legislature has approved funds for grants to be awarded to cities, towns and regional planning agencies for household hazardous waste collection days. DEQE is now working with the Department of Environmental Management to develop a grant program. We hope to be able to announce the availability of funds before January 1986.

II. Publicity

Publicity for the event can have a substantial effect on its success. Communities have used the following techniques:

- community educators could discuss this event along with other hazardous waste issues in the schools.
- libraries could provide special events on hazardous waste issues;
- media--newspaper articles, public service announcements on local radio and television stations;
- distribution of flyers; and
- posters displayed in banks, storefronts, libraries, supermarkets, and churches.

III. For more information on how to set up a Collection Day, contact the League of Women Voters at (800) 882-1649 or in Boston at 357-5880.

The following materials are available through various organizations:

- Household Hazardous Waste Collection Day Project: A How-to Kit, Lexington League of Women Voters, September 1984. Cost: $13.00
  Lexington League of Women Voters
  P.O. Box 233
  Lexington, Massachusetts 02173
  Telephone #617/862-8127 Attention: Beth Levine

- A Guide to the Safe Use and Disposal of Hazardous Household Products, Metropolitan Area Planning Council, Fall 1982.
  Cost: $4.00 business $3.00 non-profit
  Metropolitan Area Planning Council
  110 Tremont Street
  Boston, Massachusetts 02108

- A Hazardous Waste Community Action Guide, Concern, Inc., May 1981
  1794 Columbus Road, N.W.
  Washington, D.C. 20009
  Telephone #202/659-9681 Attention: Alicia Culver

- Slide Tape Program: Household Hazardous Waste, Everyone's Problem
  League of Women Voters, August 1984
  This is an 18 minute program on household hazardous waste prepared by Dana Duxbury of the Massachusetts League of Women Voters.
  League of Women Voters
  8 Winter Street
  Boston, Massachusetts 02108
  Telephone #617/357-8380 Attention: Dana Duxbury
  Cost: non-league rental slide-tape show: $25.00 and $35.00 refundable deposit, non-league rental/videotape: $20.00 and $20.00 refundable deposit, available for purchase at $60.00

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF HAZARDOUS WASTE

HAZARDOUS WASTE TRANSPORTER LICENSE

Name of Licensee		Mailing Address of Licensee	
Contact Person	Effective Date	Mass. License Number	DPU Certification Number
Phone Number	Expiration Date	EPA Identification Number	

This is to certify that the above named company is hereby granted a license to transport hazardous waste pursuant to G.L. Chapter 21C and 310 CMR 30.000.

THIS LICENSE AUTHORIZES ONLY THE NAMED LICENSEE TO ENGAGE IN THE ACTIVITIES DESCRIBED ABOVE. THIS LICENSE IS NOT TRANSFERRABLE. THIS LICENSE DOES NOT GRANT ANY RIGHTS NOT OTHERWISE GRANTED BY FEDERAL, STATE, OR LOCAL STATUTES, ORDINANCES, OR REGULATIONS. THE LICENSEE SHALL COMPLY AT ALL TIMES WITH ALL STATE AND FEDERAL REGULATIONS AND STATUTES APPLICABLE TO THE TRANSPORTATION OF HAZARDOUS WASTE.

Signature of Applicant or Individual Authorized by 310 CMR 30.807	Date	William F. Cass, Director Division of Hazardous Waste	Date